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Attorneys for Plaintiffs

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION  
20

21 CALIFORNIA COALITION FOR WOMEN  
PRISONERS et al.,  
22 Plaintiffs,  
23 v.  
24 UNITED STATES OF AMERICA FEDERAL  
BUREAU OF PRISONS et al.,  
25 Defendants.  
26

Case No. 4:23-cv-04155-YGR

**PLAINTIFFS' WITNESS LIST FOR  
EVIDENTIARY HEARING ON  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Judge: Hon. Yvonne Gonzalez Rogers  
Trial Date: None Set

1 Plaintiffs respectfully provide the following witness list for the Preliminary Injunction  
 2 Evidentiary Hearing. Plaintiffs may affirmatively call the following individuals to testify live at  
 3 the evidentiary hearing calendared to begin on January 3, 2024.

Name	Brief Description of Substance of Testimony
C.A.H* <sup>12</sup>	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation, access to medical care, and use of the Special Housing Unit (“SHU”).
R.B. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and access to medical care.
K.C.	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation.
K.D. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation.
R.E.E.	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and access to medical care.
R.F	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and use of the SHU.
M.H	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation.
Y.H.M. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and access to medical care.
S.L. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation.

26 <sup>1</sup> \*Denotes primary witness, pursuant to Civil Pretrial Standing Order ¶3.c.

27 <sup>2</sup> Dkt. No. 17 granted Plaintiffs' application to proceed using initials only. The individual  
 28 inmates' full names have been disclosed to counsel for Federal Defendants but will not be  
 used in Court.

<b>Name</b>	<b>Brief Description of Substance of Testimony</b>
J.L.	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation.
T.M. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and use of the SHU.
M.M.	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff.
M.M. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation.
J.M. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and access to medical care.
K.P.R *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation.
L.P.R.	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and use of the SHU.
E.R	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including but not limited to retaliation
J.P. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation, access to medical care, and use of the SHU.
A.S.	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and use of the SHU.
A.V. *	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff.
F.V.G.B.	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation and use of the SHU.

Name	Brief Description of Substance of Testimony
Stephen Putnum	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, reporting, retaliation, and use of the SHU. Plaintiffs intend to call only if the Government does not call.
Morgan Agostini	Testimony regarding current conditions at FCI Dublin and inmate treatment by staff, including, but not limited to, retaliation, use of the SHU, and the subject matter of her November 13, 2023 declaration. Plaintiffs intend to call only if the Government does not call.

Plaintiffs reserve the right to amend this list of witnesses, and to call any and all witnesses necessary to address or rebut matters put into evidence by Defendants. Plaintiffs also reserve the right to call any witness from Defendants witness list.

DATED: December 29, 2023

Respectfully submitted,

RIGHTS BEHIND BARS  
CALIFORNIA COLLABORATIVE FOR  
IMMIGRANT JUSTICE  
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By: /s/ Kara J. Janssen  
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